

1 THE HONORABLE MARSHA J. PECHMAN  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
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11 FRANTZ SAMSON, a Washington resident,  
12 individually and on behalf of all others similarly  
13 situated,

14 Plaintiff,

15 v.

16 UNITEDHEALTHCARE SERVICES, INC.,  
17  
18

19 Defendant.

20 Case No. 2:19-cv-00175-MJP  
21  
22

23 **JOINT MOTION AND [PROPOSED]  
24 ORDER TO EXTEND DEADLINES  
FOR DECERTIFICATION  
BRIEFING BY ONE WEEK**

25 **NOTED FOR CONSIDERATION:**  
26 SEPTEMBER 6, 2024  
27

28 The parties respectfully request that the Court extend by one week the deadlines for  
29 briefing on Defendant's motion for decertification (Dkt. No. 311) and Defendant's  
30 corresponding motion to seal (Dkt. No. 310). In support of this motion, the parties stipulate as  
31 follows:

32 WHEREAS, on July 22, 2024, Defendant filed a motion to decertify the classes (Dkt. No.  
33 311) and a corresponding motion to seal (Dkt. No. 310);

34 WHEREAS, following Defendant's motion to decertify, Plaintiff served discovery,  
35 including Federal Rule of Civil Procedure 30(b)(1) and 30(b)(6) deposition notices concerning  
36 evidence Defendant submitted in connection with its decertification motion;

37 WHEREAS, Plaintiff submitted a request for production of additional call recordings  
38 following the submission of Defendant's motion to decertify and also took depositions of call-  
39 agent witnesses for trial whom Defendant had identified pursuant to the case schedule;

40 JOINT MOTION AND [PROPOSED] ORDER TO  
41 MODIFY CASE SCHEDULE - 1  
42 Case No. 2:19-cv-00175-MJP

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1 WHEREAS, Defendant agreed to re-note its decertification motion for September 27,  
 2 2024, and the Court granted the parties' stipulated motion to extend the deadline for Plaintiff's  
 3 response to September 6, 2024, and Defendant's reply to September 27, 2024 (Dkt. No. 322);

4 WHEREAS, Plaintiff received the transcript of the deposition he took on August 29,  
 5 2024 at around 8:20 a.m. on September 6, 2024, and Plaintiff received the transcript for the  
 6 deposition he took on September 4, 2024 at 11:30 a.m. on September 5, 2024;

7 WHEREAS, Defendant produced additional recordings at Plaintiff's request on  
 8 September 3, 2024;

9 WHEREAS, Plaintiff requests an additional week to enable sufficient time for Plaintiff to  
 10 review and account for the deposition transcripts and additional recordings;

11 WHEREAS, the parties have conferred, and Defendant does not oppose the relief that  
 12 Plaintiff seeks in this motion;

13 WHEREAS, the parties propose the following:

<b>Event</b>	<b>Current Date</b>	<b>Proposed Date</b>
Plaintiff's Response to Decertification Motion and Response to Motion to Seal	September 6, 2024	September 13, 2024
Defendant's Reply in Support of Decertification Motion and Motion to Seal	September 27, 2024	October 4, 2024

20 Accordingly, the parties request that the Court modify the case schedule as follows:

<b>Event</b>	<b>Date</b>
Plaintiff's Response to Decertification Motion and Motion to Seal	September 13, 2024
Defendant's Reply in Support of Decertification Motion and Motion to Seal	October 4, 2024

1 RESPECTFULLY SUBMITTED AND DATED this 6th day of September, 2024.

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61 *Attorneys for Defendant*

## ORDER

IT IS SO ORDERED.

DATED this 10th day of September, 2024.

Wesley F. Releman

THE HONORABLE MARSHA J. PECHMAN

JOINT MOTION AND [PROPOSED] ORDER TO  
MODIFY CASE SCHEDULE - 4  
Case No. 2:19-cv-00175-MJP

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